EXHIBIT 12

```
 1                    - BENJAMIN WILSON -

 2   IN THE UNITED STATES DISTRICT COURT
     FOR THE SOUTHERN DISTRICT OF NEW YORK
 3   ------------------------------------- X
     ULKU ROWE,

 4
                    Plaintiff,

 5
                              Case No.
 6                            19 Civ. 08655(LGS)(GWG)


 7                 v.


 8   GOOGLE LLC,

                    Defendant.
 9

10   ------------------------------------- X

11   DATE:  December 2, 2020

12   TIME:  10:21 a.m.

13


14             VIDEOTAPED VIDEOCONFERENCE DEPOSITION

15   OF BENJAMIN WILSON, held via Zoom, pursuant to

16   Notice, before Hope Menaker, a Shorthand Reporter

17   and Notary Public of the State of New York.

18

19

20

21

22

23

24

25
```

1   - BENJAMIN WILSON -

2   managers to help inside Cloud Systems. I went and

3   spoke to a few people and it turned out that the

4   answer was yes and so I took a chance there and

5   did some interviews.

6   Q.   Did you ever see a job description

7   for the product management role that you

8   interviewed for?

9   A.   Yes. Eventually, yes, I did.

10   Q.   Okay, and do you recall what title

11   that role had?

12   A.   I don't recall off the top of my head

13   what -- what the precise title was.

14   Q.   What was your understanding of what

15   the product management role entails?

16   A.   Coming up with a vision of where

17   the product is going to go, to find a kind of

18   three-year road map, and then going down to a

19   yearlong road map with quarterly deliverables that

20   drove an outcome that was positive for customers.

21   Q.   Did you believe that your skill set

22   was transferable to that product management role?

23   A.   Given I had run product management

24   organizations in my prior two companies, yes.

25   Q.   Was there any skills that you were

```
 1                    - BENJAMIN WILSON -

 2   using in the OCTO role or the client technical

 3   lead role that were transferable to the PM role?

 4             MR. GAGE:  Objection.

 5        A.    Yes, identifying gaps in our -- our

 6   product lines and features and functions that were

 7   missing.

 8        Q.    Was there any aspect of the work that

 9   you had been doing in OCTO or Mr. Shaukat's

10   organization that involved product management?

11             MR. GAGE:  Objection.

12        A.    Some.  It was more being able to

13   identify gaps in features.  We were working with

14   customers who were doing high-performance compute

15   and we had some gaps in features and so we would

16   identify those gaps and help our colleagues, you

17   know, figure out how to solve them.

18        Q.    Did the product management role

19   involve collaboration?

20        A.    Yes.

21        Q.    Was that also true with respect to

22   the role that you had played up until that point

23   in time?

24        A.    Yes.

25        Q.    Was your technology experience up
```

```
1                    - BENJAMIN WILSON -

2    until that point in time relevant to the product

3    management role that you moved into?

4              MR. GAGE:  Objection.

5         A.    Yes.  Basically we were building what

6    I had built at GE and at P2 and we were building

7    that for Cloud, so there was a direct

8    applicability.

9         Q.    Did the product management role

10   require that you identify AI-related design

11   development or deployment friction points from the

12   customer's perspective?

13             MR. GAGE:  Objection.

14        A.    Which role?

15        Q.    The product management role.

16        A.    Yes.

17        Q.    Did the product management role

18   look to entail rallying teams to work through

19   deployment hurdles, product updates, new product

20   offerings, and solutions?

21             MR. GAGE:  Objection.

22        A.    Yes.

23        Q.    Did the product management role

24   require you or entail working with customers and

25   other partners on joint initiatives?
```

```
 1                     - BENJAMIN WILSON -

 2          A.     Yes.

 3          Q.     Did the product management role

 4    entail corroborating across functional and product

 5    area boundaries?

 6          A.     Yes.

 7          Q.     Did the product management role

 8    require you to work with broader Google

 9    engineering PMs and research teams?

10          A.     Yes.

11          Q.     Did the product management role

12    require you to be able to do deep dives with the

13    internal engineering team?

14          A.     Yes.

15          Q.     Did the product management role

16    involve working on cross-Google technical working

17    teams?

18          A.     Yes.

19          Q.     Did the product management role

20    involve getting hands-on with customer projects?

21          A.     Generally, no.

22          Q.     Did the product management role

23    involve defining and solving AI problems that

24    spanned code, infrastructure, strategy business,

25    and FUD?
```

```
 1                  - BENJAMIN WILSON -

 2        A.     I --

 3               MR. GAGE:  Objection.

 4        A.     I don't know what FUD is.

 5        Q.     Putting aside FUD then, did the

 6   product management role involve defining and

 7   solving AI problems across code, infrastructure,

 8   strategy and business?

 9        A.     In --

10               MR. GAGE:  Objection.

11        A.     In some cases, yes.

12        Q.     Did the product management role

13   involve any private whiteboarding sessions?

14        A.     Yes.

15        Q.     Did the product management role

16   involve any public evangelism?

17        A.     Yes.

18        Q.     Did the product management role

19   require experience in designing, scoping, and

20   delivering complex applications and services?

21               MR. GAGE:  Objection.

22        A.     No.

23        Q.     Did the product management role

24   require experience with multiple software design

25   methodologies?
```

```
 1                    - BENJAMIN WILSON -

 2        A.     Yes.

 3        Q.     Did the product management role

 4   require an understanding of the challenges modern

 5   enterprises faced with respect to scale, speed,

 6   and user expectations?

 7                MR. GAGE:  Objection.

 8        A.     Yes.

 9        Q.     When you moved into the product

10   management role, did your level change?

11        A.     No.

12        Q.     What is your current level?

13        A.     I am still an L 9.  My expectation is

14   if I move into the product management role

15   officially, I will be downgraded to an L 8.

16        Q.     So at this point in time, are you

17   functioning in a product management position or

18   are you functioning in the technical client lead

19   position?

20        A.     Product management.

21        Q.     And how long have you been

22   functioning in the product management position?

23        A.     Roughly six months.

24                I -- I do need to provide a

25   clarification to that.  I started the role in
```